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Attorney for Defendant
TROY URIE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TROY URIE,

Defendant.

No. CR. S-03-534 FCD

STIPULATION AND ORDER
TO CONTINUE STATUS
CONFERENCE AND FINDING
OF EXCLUDABLE TIME

The United States of America, through Assistant U.S. Attorney Heiko Coppola, and defendant Troy Urie, through his counsel Scott L. Tedmon, hereby stipulate and agree as follows:

1. The current status conference in this case is set for March 30, 2009 at 10:00 a.m.
2. In this case, the Court has previously excluded time under the Speedy Trial Act through March 30, 2009 under 18 U.S.C. §3161(h)(8)(B)(ii) and (iv), [Local Code T2 and T4], complex case and counsel's need for time to prepare.
3. This case is complex in that the Indictment charges facts which involve multiple jurisdictions, some located across the United States. Additionally, there are legal issues involving alleged conduct in other federal jurisdictions which need to be reviewed, researched and involve the likelihood of litigation. Specifically, defendant Urie is currently represented by attorney John Balazs in his appeal to the Ninth Circuit from his conviction arising out of the Northern District of California. The facts presented by the government in the Northern District conviction included

1 conduct charged in this case. In reviewing both the Northern District and Eastern District cases with
2 defendant Urie and attorney John Balazs, the issue of collateral estoppel may need to be litigated
3 in both the Ninth Circuit appeal and in the case at bar. Defense counsel needs additional time to
4 conduct further research on this issue as well as other matters relating to the preparation of the case.

5 In addition to this legal issue, the defense is continuing to conduct their investigation and
6 factual review of the case. Based on these factors, the parties stipulate that the Court's finding of
7 complexity and counsel's need for time to prepare pursuant to 18 U.S.C. § 3161(h)(8)(B)(ii) and (iv)
8 is appropriate.

9 4. The parties stipulate and agree that the Court should reiterate its previous finding that
10 time should be excluded under the Speedy Trial Act, pursuant to 18 U.S.C. §3161(h)(8)(B)(ii) and
11 (iv), [Local Code T2 and T4], and that the ends of justice therefore outweigh the best interest of the
12 public in a speedy trial.

13 5. Accordingly, it is hereby stipulated and the parties agree that the date for the status
14 conference in this matter be continued to April 27, 2009 at 10:00 a.m., and that time be excluded
15 under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(8)(B)(ii) and (iv), [Local Code T2 and
16 T4], in that this case is complex, counsel for the parties need time to prepare, and that the ends of
17 justice outweigh the best interest of the public in a speedy trial.

18 6. Michele Krueger has approved the requested court date.

19 7. Scott L. Tedmon has been authorized by the government's counsel to sign this stipulation
20 on his behalf.

21 **IT IS SO STIPULATED.**

22 DATED: March 25, 2009

McGREGOR W. SCOTT
United States Attorney

23 /s/ Heiko Coppola
24 HEIKO COPPOLA
Assistant United States Attorney

25 DATED: March 25, 2009


LAW OFFICE OF SCOTT L. TEDMON

26 /s/ Scott L. Tedmon
27 SCOTT L. TEDMON
Attorney for Defendant Troy Urie
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IT IS ORDERED that this matter is continued to April 27, 2009, at 10:00 a.m., for further Status Conference.

IT IS SO ORDERED.


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE